

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Misc. No. 17-151-LPS

**STIPULATION AND [PROPOSED] ORDER PERMITTING COUNSEL
FOR INTERVENOR BONDHOLDERS TO REVIEW OBJECTIONS
AND RESPONSES REGARDING PROPOSED SALE PROCEDURES ORDER
AND RELATED SPECIAL MASTER’S REPORT AND RECOMMENDATION**

WHEREAS, on August 9, 2021, the Proposed Sale Procedures Order, D.I. 302, and the Special Master’s Report and Recommendation Regarding Proposed Sale Procedures Order (the “Report”), D.I. 303, were filed under seal;

WHEREAS, on August 16, 2021, the Court so-ordered a Stipulation and Order, D.I. 305, permitting counsel for the Intervenor Bondholders at Paul, Weiss, Rifkind, Wharton & Garrison, LLP (“Paul, Weiss”) to review (a) an unredacted copy of the Proposed Sale Procedures Order, D.I. 302, and (b) a copy of the Report with redactions of material containing, or derived from, information designated as “Highly Confidential” by Crystallex or the Venezuela Parties pursuant to the Special Master Confidentiality Order, D.I. 291; and

WHEREAS, counsel for the Intervenor Bondholders at Paul, Weiss have conferred with counsel for the Special Master and counsel for the undersigned parties and nonparties concerning arrangements for access by Paul, Weiss to objections to the Proposed Sale Procedures Order and the Report and responses to those objections;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED as follows:

1. As soon as is reasonably practicable, copies of all objections to the Proposed Sale Procedures Order and Report and accompanying submissions, filed on August 25, 2021, D.I. 316, 317, 319, will be made available to counsel for the Intervenor Bondholders at Paul, Weiss, with redactions of material containing, or derived from, information designated “Highly Confidential” by Crystallex or the Venezuela Parties pursuant to the Special Master Confidentiality Order, D.I. 291.

2. Copies of responses to objections to the Proposed Sale Procedures Order and Report, which are due to be filed on September 10, 2021, shall also be made available to counsel for the Intervenor Bondholders at Paul, Weiss, with redactions of material containing, or derived from, information designated “Highly Confidential” by Crystallex or the Venezuela Parties pursuant to the Special Master Confidentiality Order, D.I. 291.

3. Counsel for the Intervenor Bondholders at Paul, Weiss shall not disclose the contents of the documents described in paragraphs 1 or 2 to any other person, including the Intervenor Bondholders themselves, in the absence of a further order by this Court permitting such disclosure.

Dated: August 30, 2021

/s/ Daniel A. Mason

Daniel A. Mason (#5206)
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
500 Delaware Avenue, Suite 200
Post Office Box 32
Wilmington, DE 19899
302-655-4410
dmason@paulweiss.com

Walter Rieman (*pro hac vice*)
Jonathan Hurwitz (*pro hac vice*)
PAUL, WEISS, RIFKIND,
WHARTON & GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019
212-373-3000
wrieman@paulweiss.com
jhurwitz@paulweiss.com

Attorneys for Intervenor Bondholders

/s/ Travis S. Hunter

Raymond J. DiCamillo (#3188)
Jeffrey L. Moyer (#3309)
Travis S. Hunter (#5350)
RICHARDS, LAYTON & FINGER, P.A.
One Rodney Square
920 North King Street
Wilmington, DE 19801
302-651-7700
dicamillo@rlf.com
moyer@rlf.com
hunter@rlf.com

Robert L. Weigel (*pro hac vice*)
Jason W. Myatt (*pro hac vice*)
Rahim Moloo (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, NY 10166
212-351-4000
rweigel@gibsondunn.com
jmyatt@gibsondunn.com
rmoloo@gibsondunn.com

Miguel A. Estrada (*pro hac vice*)
Lucas C. Townsend (*pro hac vice*)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036
202-955-8500
mestrada@gibsondunn.com
ltownsend@gibsondunn.com

*Attorneys for Plaintiff
Crystallex International Corporation*

/s/ Stephen C. Childs

A. Thompson Bayliss (#4379)
Stephen C. Childs (#6711)
ABRAMS & BAYLISS LLP
20 Montchanin Road, Suite 200
Wilmington, DE 19807
302-778-1000
bayliss@abramsbayliss.com
childs@abramsbayliss.com

Donald B. Verrilli, Jr. (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Avenue, N.W.
Suite 500 E
Washington, DC 20001
202-220-1100
donald.verrilli@mto.com

George M. Garvey (*pro hac vice*)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071
213-683-9100
george.garvey@mto.com

*Attorney for Defendant
Bolivarian Republic of Venezuela*

/s/ Samuel T. Hirzel

Samuel T. Hirzel, II (#4415)
HEYMAN ENERIO GATTUSO & HIRZEL LLP
300 Delaware Avenue, Suite 200
Wilmington, DE 19801
(302) 472-7300
shirzel@hegh.law

Joseph D. Pizzurro (*pro hac vice*)
CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP
101 Park Avenue
New York, NY 10178
212-696-6000
jpizzurro@curtis.com

*Attorney for Intervenor
Petróleos de Venezuela, S.A.*

/s/ Alexandra M. Cumings

Kenneth J. Nachbar (#2067)
Alexandra M. Cumings (#6146)
MORRIS, NICHOLS, ARSHT & TUNNELL LLP
1201 North Market Street
Wilmington, DE 19801
302-658-9200
knachbar@mnat.com
acumings@mnat.com

Nathan P. Eimer
Lisa S. Meyer
EIMER STAHL LLP
224 South Michigan Avenue
Suite 1100
Chicago, IL 60604
312-660-7600
neimer@eimerstahl.com
lmeyer@eimerstahl.com

*Attorney for PDV Holding, Inc.
and CITGO Petroleum Corporation*

/s/ Garrett B. Moritz

Garrett B. Moritz (#5646)
ROSS ARONSTAM & MORITZ LLP
100 South West Street, Suite 400
Wilmington, DE 19801
302-576-1600
gmoritz@ramllp.com

Michael S. Kim
Marcus J. Green
Josef M. Klazen
KOBRE & KIM LLP
800 Third Avenue
New York, NY 10022
212-488-1200
michael.kim@kobrekim.com
marcus.green@kobrekim.com
jef.klazen@kobrekim.com

Richard G. Mason
Amy R. Wolf
Michael H. Cassel
WACHTELL, LIPTON, ROSEN & KATZ
51 West 52nd Street
New York, NY 10019
212-403-1000
rgmason@wlrk.com
arwolf@wlrk.com
mhcassel@wlrk.com

*Attorneys for Phillips Petroleum Company
Venezuela Limited and ConocoPhillips
Petrozuata B.V.*

IT IS SO ORDERED this _____ day of _____, 2021.

The Honorable Leonard P. Stark
United States District Judge